

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

VS.

RICK PERRY, *et al.*,

Defendants.

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§

CIVIL ACTION NO. 2:13-CV-00193

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, ET AL,)
) CIVIL ACTION
)
Plaintiffs,) NO. 2:13-CV-00193
)
V.)
)
RICK PERRY, ET AL,)
)
Defendants.)

ORAL DEPOSITION OF

THOM RANSOM CORNISH, C.P.A.

AUGUST 7, 2014

ORAL DEPOSITION OF THOM RANSOM CORNISH, C.P.A.,
produced as a witness at the instance of the
DEFENDANTS, and duly sworn, was taken in the
above-styled and numbered cause on the 7th of August,
2014, from 10:03 a.m. to 4:01 p.m., before Tamara
Vinson, CSR in and for the State of Texas, reported by
machine shorthand, at 808 Travis, Suite 1520, Houston,
Texas, 77002, pursuant to the Federal Rules of Civil
Procedure and the provisions stated on the record or
attached hereto.

1 were not dated and not numbered relating to the cost
2 implement SB14.

3 Q. Okay. Can you tell if that was the
4 deposition in the current case or does that appear to
5 be the -- let me look at it.

6 A. (Tendering document to Mr. Keister.)

7 Q. All right. Gotcha. Thanks.

8 A. Okay. I need --

9 Q. That would be the deposition taken in this
10 case, as opposed to the 2012 case?

11 A. I believe so, yes.

12 Q. All right. Okay.

13 THE WITNESS: Could we turn this down,
14 the fan?

15 MR. KEISTER: Sure.

16 THE WITNESS: Or reverse it, so it blows
17 up?

18 MR. KEISTER: Off the record.

19 (Break.)

20 MR. KEISTER: Back on the record.

21 A. It appears to be another press release by the
22 Secretary of State's office. Bates stamp number is
23 Texas 524740 relating to the November 5th,
24 constitutional election, which according to this first
25 election which required photo ID.

1 license, but I don't -- I don't know of any that don't
2 have a driver's license.

3 Q. Okay. Do you attend a church?

4 A. Not regularly, no, sir.

5 Q. Okay. All right. I guess, just the long and
6 short of my question is: Do you know anybody that
7 does not have a driver's license or some form of ID
8 that would allow them to vote under SB14?

9 A. Never really thought about it, but I don't
10 think so.

11 Q. Okay. Have you ever had anyone come up and
12 tell you that they have not been able to vote because
13 of the photo ID requirements of SB14?

14 A. No, sir.

15 Q. Okay. Have --

16 MR. BRAZIL: Hold that thought. Let me
17 get her to order lunch.

18 MR. KEISTER: Okay. Why don't we take a
19 break?

20 MR. BRAZIL: Okay.

21 MR. KEISTER: We've been going for
22 almost an hour and a half.

23 MR. BRAZIL: Okay.

24 (Break.)

25 MR. KEISTER: Back on the record.

1 Q. All right. Okay. And I agree. I'm not
2 trying. . .

3 A. We don't want to be slandering no lawyers.

4 Q. That's right, exactly. All right. In this
5 particular case, are you expressing any opinions in
6 this case that are based upon legal standards,
7 accepted legal standards?

8 A. No, sir.

9 Q. Okay. And is your role in this case to be a
10 witness offering legal opinions in this case?

11 A. I don't believe so, no.

12 Q. Okay.

13 MR. KEISTER: Okay. All right. Why
14 don't we go ahead and take a break? Off the record.

15 (Lunch recess.)

16 MR. KEISTER: All right. Back on the
17 record.

18 Q. (By Mr. Keister) Mr. Cornish, have you ever
19 been disciplined by the State Bar?

20 A. No, sir.

21 Q. Okay. Do you do any appellate practice?

22 A. I've done one appeal. I've argued one
23 appeal.

24 Q. Okay. Any published opinions out there with
25 your name on them as the lawyer?

1 the numbers of provisional ballots in Harris County
2 and the percentage of rejected provisional ballots and
3 the percentage that were based on SB14 is strictly
4 numbers or information you took from the information
5 Harris County gave you. Correct?

6 A. Correct.

7 Q. Okay. You did no deeper investigation or
8 analysis, other than looking at the ballots,
9 themselves, and trying to determine which ones
10 indicated a photo issue. Correct?

11 A. The affidavits.

12 Q. Okay.

13 MR. KEISTER: Okay. All right. Let's
14 take a short break.

15 (Break.)

16 Q. (By Mr. Keister) Mr. Cornish, before the
17 break we were finishing up our discussion of the
18 provisional ballot portion of your report. What
19 expertise -- what legal expertise did you employ in
20 your attempt to make an analysis of the provisional
21 ballots?

22 A. Well, I guess I'm generally familiar with the
23 Election Code, like the Government Code or any other
24 code that State of Texas passes and maintains. I
25 understand how to read a provisional ballot. I

1 Q. Okay. And you understand that's not a
2 renewable fund, once that money is gone, it's gone,
3 it's not renewed by the federal government?

4 A. Correct.

5 Q. Okay. In your report on Page 10 you refer to
6 a review of the 2012 general election wrap-up report
7 provides detail for the activities promoted by B&M
8 from January of 2012 through November of 2012. Is
9 that the same type of document as Exhibit No. 6 or is
10 that a different type of document?

11 A. Totally different.

12 Q. Okay. And is that one of the exhibits in --
13 to your report?

14 A. It's over there.

15 Q. Okay.

16 A. It's the big, thick binder.

17 Q. Okay.

18 A. Keep turning.

19 Q. I am.

20 MR. KEISTER: In fact, why don't we go
21 off the record for a minute?

22 THE WITNESS: Okay.

23 (Break.)

24 (Exhibit No. 7 marked.)

25 Q. (By Mr. Keister) Mr. Cornish, I'm going to